

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, | : | |
| | : | |
| v. | : | |
| | : | |
| GLENMARK PHARMACEUTICALS | : | Criminal No. 2:20-cr-200-RBS |
| INC., USA, | : | |
| | : | |
| Defendant. | : | |
| | : | |

**GLENMARK’S UNOPPOSED MOTION TO EXTEND TIME
TO FILE PRETRIAL MOTIONS AND ADJOURN TRIAL DATE**

Glenmark Pharmaceuticals, Inc., USA (“Glenmark”) respectfully moves the Court to extend the time to file pretrial motions and adjourn the trial date in this matter. In support of this Motion, Glenmark states as follows:

1. On June 30, 2020, the government charged Glenmark by Information with one count of violating Section 1 of the Sherman Act, 15 U.S.C. § 1. (Dkt. 1.) On July 3, 2020, Glenmark filed a Notice of Objection to Proceeding by Criminal Information, noting that it did not waive its right to grand jury presentment under the Fifth Amendment to the Constitution and Federal Rule of Criminal Procedure 7. (Dkt. 8.) The government filed a superseding indictment on July 14, 2020. (Dkt. 14.)

2. On July 17, 2020, Glenmark was arraigned before Magistrate Judge Thomas J. Rueter on the superseding indictment. At the arraignment, Judge Rueter ordered, pursuant to Local Rule 12.1, that pretrial motions be filed within fourteen days of July 17, 2020. (Dkt. 16.)

3. On July 23, 2020, the Court issued an order setting a trial date of August 31, 2020. (Dkt. 17.)

4. Glenmark has not yet received any discovery in this matter.

5. Counsel for Glenmark and the government met and conferred on July 27, 2020 and began discussions regarding the scope and timing of discovery in this case. Those discussions confirmed that discovery in this case will be voluminous.

6. The timing of discovery, in turn, will impact Glenmark's ability to evaluate and file pretrial motions.

7. The parties agreed to engage in further discussions so that a joint proposal can be made to the Court.

8. The parties respectfully request that the Court vacate the existing deadline for pretrial motions, adjourn the August 31, 2020 trial date, and set a status conference approximately six weeks from now, to allow the parties time to meet and confer regarding discovery, pretrial motions, and other scheduling matters. The parties will be prepared to discuss these matters at the status conference so the Court may issue a scheduling order following the status conference.

9. Counsel for the government consent to this motion.

[signatures on following page]

Dated: July 28, 2020

Respectfully submitted,

/s/ Beth A. Wilkinson

Lisa C. Dykstra (PA ID 67271)
Zane David Memeger (PA ID 62728)

MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
Telephone: (215) 963-5000
Fax: (215) 963-5001
lisa.dykstra@morganlewis.com
zane.memeger@morganlewis.com

Beth A. Wilkinson (*pro hac vice*)
Alexandra Walsh (*pro hac vice*)
Brian L. Stekloff (*pro hac vice*)
Kosta Stojilkovic (*pro hac vice*)

WILKINSON WALSH LLP
2001 M Street NW, 10th Floor
Washington, DC 20036
Telephone: (202) 847-4000
Fax: (202) 847-4005
bwilkinson@wilkinsonwalsh.com
awalsh@wilkinsonwalsh.com
bstekloff@wilkinsonwalsh.com
kstoilkovic@wilkinsonwalsh.com

*Attorneys for Defendant Glenmark
Pharmaceuticals Inc., USA*

CERTIFICATE OF SERVICE

I, Beth A. Wilkinson, do hereby certify that I have served a true and correct copy of the foregoing document upon all counsel/parties by electronic filing on July 28, 2020. This document has been filed electronically and is available for viewing and downloading from the ECF system.

/s/ Beth A. Wilkinson
Beth A. Wilkinson